

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY DAVID FLORES,
aka "Anton David," and
ANNA RENE MOORE,

Defendants.

No. 2:22-CR-00593-PA-2

AMENDMENT TO PROTECTIVE
ORDER REGARDING DISCOVERY

The Court has read and considered the parties' Stipulation for an Amendment to Protective Order, filed by the government and defendant Anna Rene Moore ("defendant"), in this matter on April 18, 2023, which this Court incorporates by reference into this order, and FOR GOOD CAUSE SHOWN the Court hereby FINDS AND ORDERS as follows:

1. The purpose of this Amendment (the "Amendment") to the Protective Order (the "Protective Order") is therefore to (a) allow the government to comply with its discovery obligations while protecting this sensitive information from unauthorized

1 dissemination, and (b) provide the defense with sufficient
2 information to adequately represent defendant.

3 2. Accordingly, the discovery that the government will
4 provide to defense counsel in the above-captioned case will be
5 subject to the Protective Order and this Amendment, as follows:

6 a. In addition to the other designations permitted in
7 the Protective Order, the government is also authorized to provide
8 defense counsel and defendant with Confidential Information marked
9 with the following legend: "PRODUCED TO DEFENDANT - DO NOT
10 DISTRIBUTE." The government may put that legend on the digital
11 medium (such as DVD or hard drive) or simply label a digital folder
12 on the digital medium to cover the content of that digital folder.
13 The government may also redact any PII contained in the production
14 of Confidential Information.

15 b. Defendant and the Defense Team agree to use the
16 Confidential Information, including, but not limited to, documents
17 marked ""PRODUCED TO DEFENDANT - DO NOT DISTRIBUTE," solely to
18 prepare for any pretrial motions, plea negotiations, trial, and
19 sentencing hearing in this case, as well as any appellate and post-
20 conviction proceedings related to this case.

21 c. Defendant and the Defense Team shall not permit
22 anyone other than the Defense Team or defendant to have possession
23 of or review any material marked with the designation "PRODUCED TO
24 DEFENDANT - DO NOT DISTRIBUTE." Defendant may possess copies of the
25 Confidential Information with the designation "PRODUCED TO DEFENDANT
26 - DO NOT DISTRIBUTE," and review those documents outside the
27 presence of counsel; however, defendant is expressly forbidden from
28 distributing or showing any material produced to defendant and

1 marked "PRODUCED TO DEFENDANT - DO NOT DISTRIBUTE" to other person.
2 Notwithstanding the foregoing, defendant is still forbidden from
3 possessing or reviewing any material marked "CONFIDENTIAL
4 INFORMATION -- SUBJECT TO PROTECTIVE ORDER" outside the presence of
5 the Defense Team.

6 d. Defendant agrees to return all materials given to
7 defendant and marked "PRODUCED TO DEFENDANT - DO NOT DISTRIBUTE" to
8 defense counsel at the end of the proceedings. Defense counsel will
9 then maintain or destroy these materials in accordance with the
10 terms of the Protective Order.

11 IT IS SO ORDERED.

12 April 19, 2023

13 DATE



PERCY ANDERSON
UNITED STATES DISTRICT JUDGE

15 Presented by:

16 /s/

17 ANDREW M. ROACH

18 Assistant United States Attorney
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